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January 11, 2007

#### VIA HAND DELIVERY

Lawrence H. Norton, Esq. General Counsel Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463 Re: Matter Under Review 5881 (Club for Growth, Inc.; Club for Growth, Inc. PAC; and Patrick Toomey, Treasurer)

Dear Mr. Norton:

This response is filed on behalf of Club for Growth, Inc. ("Club"); Club for Growth, Inc. PAC ("Club PAC"); and Patrick Toomey, Treasurer of Club PAC (collectively referred to as the "Respondents") in the above-captioned matter.

The Complaint makes two allegations against Respondents, both of which are false. First, the Complaint asserts that Club PAC received excessive contributions from seven individuals in 2006. In fact, however, Club PAC did not receive any excessive contributions from these individuals in 2006. Second, the Complaint asserts that Club PAC knew and informed contributors that a substantial portion of their contributions to the PAC would be used to support the campaign of Tim Walberg. This also is untrue. The fact is that Club PAC did not know, much less inform contributors about, how their PAC contributions would be used.

Because the allegations against Respondents have no basis in either the facts or the law, the Federal Election Commission ("FEC" or "Commission") should find no reason to believe that Respondents violated the Federal Election Campaign Act ("Act") and dismiss the Complaint against Respondents.

#### THE COMPLAINT

The Complaint was filed by the campaign of Michigan candidate Joe Schwarz, Schwarz for Congress, on November 16, 2006. The Complaint makes two unsubstantiated charges against Club PAC. First, the Complaint (in Count 2) alleges that Club PAC received contributions in excess of \$5,000 in 2006 from seven individuals: Bruce Bent, Robert Lansing, David MacNeil, Virginia Manheimer, Lester Weindling, William T. Wolf, and Betty Wolfe. Second, the

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Complaint (in Count 3) alleges that Club PAC "made it clear to potential contributors to the CFG-PAC that it would use a substantial portion of any CFG-PAC contribution to support Walberg for Congress" and that Club PAC "knew that a substantial potion of the contributions received by CFG-PAC would be used to support Walberg for Congress," resulting in excessive contributions to Walberg for Congress.

The Complaint attaches as Exhibit 2 a member solicitation by the Club for separate contributions to the Senate campaign of Steve Laffey, the House campaign of Tim Walberg, and Club PAC.

The Complaint attaches as Exhibit 3 an email from Pat Toomey to Club members about the Schwarz/Walberg primary election that is dated after the Michigan primary.

The Complaint attaches, as Exhibit 4, a computer disc purporting to show contribution data for contributions by certain persons to Club PAC and to Walberg for Congress. This data, along with the interpretation of the data in the Complaint, does not match the data found on the Commission's website or as found in the reports of Club PAC, also found on the Commission's website.

#### THE FACTS

Contrary to the allegations in the Complaint, Respondents did not engage in any conduct contrary to the Act. Respondents simply received and reported permissible contributions to Club PAC, served as an intermediary for properly reported earmarked candidate contributions, and communicated properly with Club members.

Club PAC is a non-party, non-candidate multicandidate political committee. Affidavit of David Keating, The Executive Director of the Club, ¶ 3, dated January 11, 2007, attached hereto at Tab 1 [hereinafter "Keating Aff."]. In 2006 Club PAC received aggregate contributions of \$5,000 from each of the seven named individuals. Id ¶¶ 4-5 and Exhibit A thereto. All seven of the individuals are members of the Club. Id. ¶ 6.

The total contributions from each of these individual members to Club PAC in 2006 were as follows:

Bruce Bent: \$5,000

Lester Weindling: \$5,000

Robert Lansing: \$5,000

William T. Wolf: \$5,000

David MacNeil: \$5,000

Betty Wolfe: \$5,000

Virginia Manheimer: \$5,000

Id. ¶¶ 4-5 and Exhibit A thereto. The other contributions by these members cited in the Complaint (and alleged to be to Club PAC) were actually properly reported and transmitted earmarked candidate contributions. Id. ¶ 8 and Exhibit B thereto. None of the earmarked contributions were written to or deposited by Club PAC. Rather, Club PAC transmitted these contributions to candidates designated by the contributors in accordance with 11 C.F.R. § 102.6. Keating Aff. ¶¶ 8-9.

#### THE LAW

An individual may contribute up to \$5,000 per calendar year to a non-candidate, non-party political committee. 11 C.F.R. § 110.1(d). An individual also may contribute \$2,100 per election to a candidate for federal office subject to an aggregate limit of \$40,000 per election cycle. *Id.* §§ 110.1(b)(1), 110.5.

Section 110.1(h) of the Commission's regulations provides, in pertinent part, as follows:

(h) Contributions to committees supporting the same candidate. A person may contribute to a candidate or his or her authorized committee with respect to a particular election and also contribute to a political committee which has supported, or anticipates supporting, the same candidate in the same election, as long as--

. . .

(2) The contributor does not give with the knowledge that a substantial portion will be contributed to, or expended on behalf of, that candidate for the same election; and

. . . .

*Id*. § 110.1(h).

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#### **DISCUSSION**

## A. Club PAC Did Not Accept Excessive Contributions

Club PAC did not accept excessive contributions in 2006 from the seven named individuals. Keating Aff. ¶¶ 4-5 and documentation attached thereto. Aggregate contributions for 2006 from each of the seven named Club members equaled \$5,000, which is the calendar-year contribution limit to multicandidate political committees under the Act, 11 C.F.R. § 110.1(d). *Id*.

The Complaint, using its attached data, alleges that these seven members made contributions to Club PAC in 2006 that were in addition to the contributions listed in Exhibit A to Mr. Keating's affidavit. Such contributions, however, were earmarked candidate contributions, as properly reported in Club PAC's reports. *Id* ¶ 8 and Exhibit B thereto (providing Club PAC reports with respect to the earmarked candidate contributions). As contributions written or charged directly to candidates, these contributions are not aggregated against the individuals' \$5,000 contribution limit to Club PAC. Accordingly, based on the actual contributions to Club PAC, Club PAC did not accept any excessive contributions in 2006 from these seven individual members.

# B. Respondents Did Not Violate or Cause Other Persons To Violate the Act Through 11 C.F.R. § 110.1(h)

The Complaint alleges that individuals who contributed to both Club PAC and Walberg for Congress violated the contribution limits with respect to Walberg for Congress because of the operation of section 110.1(h) of the Commission's regulations. This charge rests on an unfounded allegation that Club PAC told contributors that their contributions would be used to support Walberg for Congress.

These allegations are plainly false. Club PAC solicitations in no way indicated that Club PAC funds received in connection with solicitations for the PAC would be used to support Walberg for Congress. Further, contributors could not be charged with the knowledge that their funds would be expended for or contributed to Walberg for Congress since Club PAC itself had no such knowledge. See Keating Aff. ¶ 10. As a result, no contributor to both Club PAC and Walberg for Congress made excessive contributions to Walberg for Congress.

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Page 3

1. Club PAC Did Not Know In Advance How It Would Use Its Funds

Club PAC does not know in advance for whom it is going to make independent expenditures or contributions or in what amounts until the decision to make an expenditure or contribution is made. *Id.* ¶ 10. The final decisions are based upon political and financial factors that "change by the hour." *Id.* Factors include cash on hand, polls, likelihood of victory, a candidate's views on issues, an incumbent's votes, and an opponent's activities, funding, and campaign advertisements. *Id.* Since Club PAC does not know its future involvement in races until the very last moment, it would be impossible for it to relay to PAC contributors the information that it does not possess. *See id.* 

2. Complaint and Other Evidence Show That Club PAC Did
Not Inform Contributors of Any Use for the Walberg
Campaign

Club PAC does not inform contributors as to how their contributions will be used, other than to support candidates generally. *Id.* ¶ 11. In the same vein, Club PAC did not inform contributors that their contributions would be used to support Walberg for Congress. Id ¶ 12. The Complaint itself provides additional information to support this sworn testimony of Mr. Keating.

First, the purported CFG member communication attached to the Complaint as Exhibit 2 is a permissible joint fundraising solicitation. The communication, however, vividly separates its pitch for Club PAC from the solicitations for the candidates, discussing candidates in general terms in the PAC section of the joint solicitation. In the Club PAC section of the solicitation, CFG does not mention Laffey, Walberg, or their races.

In fact, the text of Exhibit 2 contradicts the allegations in the Complaint. The whole tenor of the solicitation is that there are many unnamed races across the country ("in race after race, state after state") in which Club PAC would like to participate if it receives adequate funding from members. This appeal contrasts fully with the sections soliciting candidate contributions for specific races. The

From Club PAC's FEC reports and from paragraph 14 of the Complaint, it is clear that Club PAC was involved in many races around the country.

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candidate sections are about Laffey and Walberg and their opponents, while the other section sells softly on behalf of the other, unnamed candidates who do not have the pull of these two challengers (e.g., "Build the Club for Growth PAC").

Second, the purported Toomey email attached to the Complaint as Exhibit 3 also contradicts the Complaint's allegations. This email is dated August 9, 2006, the day after the Michigan primary contest between Walberg and Schwarz. As a result, such information was not received by contributors to Club PAC until the pertinent primary was over and could not have informed contributors to Club PAC as to the use of the PAC funds for the Walberg campaign before this date.

In the end, the Complaint provides no information that could fulfill the "knowledge" requirement of section 110.1(h) and there is no such information. Club PAC itself, when it solicited PAC funds, did not know how it would use the contributions, and, in any event, did not inform contributors that their funds would be used to support Walberg for Congress.

#### **CONCLUSION**

In sum, respondents neither received excessive contributions to Club PAC in 2006 nor violated, or caused others to violate, the Act through the operation of 11 C.F.R. § 110.1(h). The Commission therefore should find no reason to believe that Respondents violated the Act and should dismiss them from this Matter.

Sincerely,

Carol A. Laham

Carl G. Jakan

D. Mark Renaud

### BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of Club for Growth, Inc. PAC	)	MUR 5881
et al.	)	
	)	

#### AFFIDAVIT OF DAVID KEATING

DAVID KEATING, first being duly sworn, deposes and says:

- 1. I am David Keating. I am the Executive Director of the Club for Growth, Inc. ("CFG").
- 2. I have read the complaint in Matter Under Review 5881 filed by Matt Marsden on behalf of Schwarz for Congress.
- 3. Club for Growth, Inc. PAC ("Club PAC") is a duly registered and reporting multicandidate political committee.
- 4. Attached hereto at Exhibit A is a list of the 2006 contributions to Club PAC received from the seven individuals named in the Complaint: Bruce Bent, Robert T.E. Lansing, David B. MacNeil, Virginia Manheimer, Lester L. Weindling, William T. Wolf, and Betty K. Wolfe.
  - 5. The aggregate 2006 contributions to Club PAC from each individual was \$5,000.
  - 6. These seven named individuals are members of CFG.
- 7. On January 11, 2007, Club PAC amended its reports to account for the \$1,500 contribution received from Robert T.E. Lansing on August 11, 2006.
- 8. The other contributions by these seven members that the Complaint categorizes as contributions to Club PAC were in fact earmarked candidate contributions that were properly forwarded and reported by Club PAC. See the pages from Club PAC Federal Election Commission reports attached hereto at Exhibit B.
- 9. Club PAC transmits and reports earmarked contributions to candidates in accordance with 11 C.F.R. § 102.6.
- 10. Club PAC was not in a position to inform contributors how Club PAC funds would be used in any given election cycle. Club PAC does not know how its funds are going to be used until they are in fact expended. The final decisions about candidate contributions and independent expenditures involves complex political and financial decisions, the factors of which change by the hour. These factors include cash-on-hand, polls, likelihood of victory, a candidate's views on issues, an incumbent's votes, and the opponent's activities, funding, and campaign advertisements.

- When soliciting contributions, Club PAC does not inform contributors as to the 11. allocation of Club PAC funds, other than to support candidates generally.
- 12. Club PAC made no predetermination that it would expend funds to support Walberg for Congress. In seeking Club PAC contributions, Club PAC did not inform contributors to Club PAC that PAC contributions would be used to support Walberg for Congress.

Under penalty of perjury and any other penalties possibly applicable under law, I swear that the foregoing statements are true to the best of my knowledge, belief, and recollection.

David Kearing

Sworn and subscribed to Before me this [ ] day of

January, 2007.

My commission expires: September 14,4009

# EXHIBIT A AFFIDAVIT OF DAVID KEATING

## **Contributions to Club PAC**

Contributor	Date Contribution Received	Contribution Amount
Bruce Bent	April 20, 2006	\$5,000
Robert T.E. Lansing	March 6, 2006	\$500
Robert T.E. Lansing	April 3, 2006	\$2,000
Robert T.E. Lansing	July 25, 2006	\$1,000
Robert T.E. Lansing	August 11, 2006	\$1,500
David B. MacNeil	June 26, 2006	\$5,000
Virginia Manheimer	May 30, 2006	\$5,000
Lester L. Weindling	January 30, 2006	\$2,500
Lester L. Weindling	March 1, 2006	\$2,500
William T. Wolf	April 10, 2006	\$5,000
Betty K. Wolfe	February 23, 2006	\$2,000
Betty K. Wolfe	March 24, 2006	\$1,500
Betty K. Wolfe	June 1, 2006	\$1,500

# EXHIBIT B AFFIDAVIT OF DAVID KEATING

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	Mailing Address 1100 North Ridgeland	evA t		1 " D D , Y / Y Y D B 27 200B	
	City	eted8	Zip Code	Transaction ID: SA11A1 70046	
	Oak Park	<u> </u>	60302-1136	Amount of Each Receipt this Period	
	FEC ID number of contributing	C		25 00	
	Name of Employer Info requested	Info requ		Earmarked Lambarn for Cong House CO-5	
	Receipt For 2006	Ардгера	te Year-to-Date 🛡	[MEMO ITEM]	
	X Primery General Other (specify) •		αρ		
c.	Full Name (Last, First, Middle Initial)	<u> </u>		Date of Receipt	
	Mailing Address PD Box 903			06 05 2008	
	Ciby	State	Zip Code	Transaction ID: SA11A1 68600	
	Mount Wolf	PA	17347-1503	Amount of Each Receipt this Penod	
	FEC ID number of contributing federal political committee	C		2100 00	
	Name of Employer	Occupati	on	Earmarked Calvey for Cong. House QK-5	
	Receipt For 2008		ite Year-to-Date \(\mathbf{Y}\)		
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SCHEDULE A (FEC Form 3X) TEMIZED RECEIPTS	Use separate schedule(s) or each category of the Detailed Summary Page	FOR LINE NUMBER. PAGE 493/1743 [check only one]    X 118
Any information copied from such Reports and S or for commercial purposes, other than using the NAME OF COMMITTEE (In Full) CLUB FOR GROWTH INC PAC	Ratements may not be sold or used by any per- name and address of any political committee t	son for the purpose of soliciting contributions o solicit contributions from such committee
Full Name (Lest, First, Mildde Initial)  Jerome Mandel  Mailing Address 8899 Compton Drive  City  Inver Grove Height  FEC ID number of contributing federal political committee  Name of Employer n.e.  Repeipt For 2006  X. Primary General  Other (specify) •	State Zip Code MIN 55076-3398  C  Occupation Retried Appregate Year-to-Date ▼	Date of Receipt  0.7 1.9 2.0.0.6  Transaction ID. \$A11A1 88181  Amount of Each Receipt this Period  50.00  Earmarked Lamborn for Cong House OO-5  [MEMO ITEM]
Full Name (Lest, First, Middle Initial)  B. Jeroma Mandel  Mailing Address 8899 Compton Drive  City  [nver Grove Height  FEC ID number of contributing  federal political committee  Name of Employer  n B  Receipt For 2006  X Primary General  Other (specify) •	State Zip Code MN 55076-3399  C  Occupation Retried  Appregate Year-to-Date ♥	Date of Receipt  1
Full Name (Last, First, Middle Initial)  Virgina Ranhelmer  Mailing Address P O Box 6D  City  Lambertville  FEC ID number of combibuting federal political committee  Name of Employer Self  Receipt For: 2008  X Primary General Other (specify) •	State Zip Code NJ 06530  C  Occupation Investor  Aggregate Year-to-Date ▼	Date of Receipt  107 1 B 2 0 0 6  Transaction ID SA11A1 86563  Amount of Each Receipt this Penod  1100 00  Earmarked Angle for Cong House NV-D2  [MEMO ITEM]
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	e name and ad	dress of any political committee to	o solicit contributions from such committee
NAME OF COMMITTEE (In Full)			
CLUB FOR GROWTH INC PAC			
Full Name (Lest, First, Middle Initial) Robert Lansing			Date of Receipt
Mailing Address 270 Westminster #300			07" 25 2006
City	State	Zip Code	Transaction ID. SA11A1 85885
Lake Forest	<u>IL</u>	60045	'Amount of Each Receipt this Period
FEC ID number of combibiling federal political committee	C		1000.00
Name of Employer Litchheid Advisors ins	Occupato		
	Real Est		
Receipt For Primary General	VDSLetter	a Year-to-Date 🖤	
Other (specify) w		3500 00	
Full Name (Last, First, Middle Initial) Robert Lanarg	_1,		Date of Receipt
Mailing Address 270 Westminster #300			N " ' D D : Y / Y T D7 25 2008
City	Spare	Zip Code	Transaction ID: SA11A1 87008
Lake Forest	<u> </u>	60045	Amount of Each Receipt this Period
FEC ID number of contributing  -federal political committee	C		1000 00
Name of Employer Litchfield Advisors Inc	Cocupate Real Es		ng House CO-5
Receipt For 2006  X Primary General  Other (specify)	Aggregal	e Year-to-Date ♥ OD	(MEMO ITEM)
Full Name (Last, First, Middle Initial) Robert Lanaing			Date of Receipt
Mailing Address 270 Westminster			07 25 2006
#300 Cily	Shate	Zip Code	Transaction ID: SA11A1 B7009
Lake Forest		60045	Amount of Each Receipt this Penod
FEC ID number of contributing federal political committee	C		1000 00
Name of Employer Litchfield Advisors Inc	Occupati Real Es		Earmarked Walberg for Co- ng House MI-07
Receipt For: 2008  X Primary General  Other (specify) •		te Year-to-Date ▼ .00	[МЕМО ІТЕМ]
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abla	NAME OF COMMITTEE (in Full)			
7	CLUB FOR GROWTH INC PAC			
A	Full Name (Lest, First, Middle Initial) Roy Weisnd			Date of Receipt
	Mailing Address 18 Rolling Hill Court			06 26 2006
	City	etetE	Zip Code	Transaction ID. SA11A1 66441
	Madison	NJ	07940	Amount of Each Receipt this Period
	FEC ID number of contributing federal political committee	C		100 00
	Name of Employer n/a	Occupate	<b>ж</b>	mg House MI-7
	Repeipt For: 2006 X Primery General		te Year-to-Date 🛡	[MEMO ITEM]
	Other (specify) w		00	
— В.	Full Name (Lest, First, Middle Initial) Roy Welland			Date of Recept
	Mailing Address 18 Rolling Hill Court			N " ' D D ' ' / Y Y D B 28 2006
	City	etel8	Zip Code	Transaction ID: SA11A1.66442
	Madison	NJ	07940	Amount of Each Receipt this Period
	FEC ID number of contributing -federal political-committee	C		100 00
	Name of Employer n/a	nployer Occupation Retried		House CO-5
	Receipt For 2006	Aggrega	ite Year-to-Date 🔻	[MEMO ITEM]
	X · Primary General Other (specify) •		ap	
<u>с.</u>	Full Name (Last, First, Middle Initial) Letter Weindling	·		Date of Receipt
	Mailing Address 515 Madison Avenue Suite 27 East	Αι	7	06 05 2006
	City New York	State NY	Zip Code 10022-5422	Transaction ID: SA11A1 68364 Amount of Each Receipt this Penod
	FEC ID number of contributing federal political committee	ber of contributing		800 do
	Name of Employer Occupation Real Estate investments		Earmarked Calvey for Cong House OK-5	
	Receipt For 2008		ate Year-to-Date 🔻	
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	y information copied from such Reports and Sta for commercial purposes, other than using the n				
$\setminus$	NAME OF COMMITTEE (In Full) CLUB FOR GROWTH INC PAC				
A	Full Name (Lest, First, Middle Initial) Douglas MarGray Mailing Address 105 Stone Crop Road				Date of Receipt
	City	State	Zip Code 19810	_	Transaction ID. SA11A1 86677 Amount of Each Receipt this Period
	FEC ID number of contributing federal political committee	C			5 00 Earmarked Laffey for Sen
	Name of Employer Andese Sirefegles Inc.  Receipt For 2006  X Primery General  Other (specify) w	Executive Appregate			Senate-RI [MEMO ITEM]
— В.	Full Name (Lest, First, Middle Initial) David Mischel				Date of Receipt
	Mailing Address 79 Pine Street City Chatham	State NJ	Zip Coda 07928-1627		D7 28 2008  Transaction ID: SA11A1 87496  Amount of Each Receipt this Period
	FEC ID number of contributing	·C			1000 00
	Name of Employer Silvercrest Asset Menegern- ent Group	Occupation	•		Earmarked Wallberg for Co- ng House Mi-07
	Receipt For 2006  X Primary General  Other (specify) •	Aggregii	e Year-to-Date ♥		[MEMO ITEM]
c.	Full Name (Lest, First, Middle Initial) Datures Haddener Holling Address - PREF M. (1991 - 1991				Date of Receipt
	Mailing Address 3805 W. 103rd Street	Shate	Zip Code		07 19 2006 Transaction ID SA11A1 B7042
	Chicago FEC ID number of contributing federal political committee	C	60855		Amount of Each Receipt this Penod 20 00
	Name of Employer Catholic New World	Occupation writer	an .		Earmarked Walberg for Co- ng House MI-07
	Receipt For 2006 X Primary General Other (specify) •	Aggregat	e Year-to-Date ▼ .00		[МЕМО ІТЕМ]
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